

EXHIBIT A

JAMES B. THORSEN
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jthorsen@thorsenallen.com
Facsimile: (804) 447-7813

November 30, 2022

RE: *Haney, et al. v. Genworth Life Insurance Co., et al.*
USDC Civil Action Case No.: 3:22-cv-00055-REP

Date	Attorney	Description	Time	Total Time
9/16/22	GBT	Telephone conference with Jeff Belkin Regarding representation of his wife Jane in the Haney v. Genworth class action pending in USDC/Richmond and September 30 th deadline for filing objections (12:55pm-1:08 pm).	.20	
9/16/22	GBT	Review of 9/12/2022 <i>Richmond Times</i> <i>Dispatch</i> article “More Rate Increases on Tap for Long-term Care Plans” and save to file and email to Belkin (6:34 pm-6:40 pm).	.10	
9/16/2022	GBT	Receipt of email from Jeffrey A. Belkin following phone conference earlier in the day and GBT’s email to Jeffrey A. Belkin with direct dial number and scheduling of second phone conference on 9/19/2022 at 11:00 a.m. (4:31 p.m.-4:37 p.m.)	.10	
9/19/2022	KM	Pacer retrieval of select case pleadings and documents in Haney, et al. v. Genworth Life Insurance Co., et al. and organize in Jane Belkin case file and forward same to co- counsel Jeffrey A. Belkin for his review (11:07 a.m.-12:09 p.m.)	1.0	
9/19/2022	GBT	Review of all Pacer pleadings and documents relative to initial filings and proposed settlements and objector filings (12:30 p.m.- 1:20 p.m.; 4:58 p.m.-6:08 p.m.)	2.10	
9/19/2022	GBT	Call to Belkin regarding review of case pleading sent earlier in the day (5:00 pm-5:25 pm).	.45	
9/21/2022	JAR	Review docket sheet and filings, including ECF Nos. 1, 12, 17, 24, 26, 27, 28, 31, 34, 35, 37, 44, 45 (3:32 pm – 4:35 pm)	1.05	



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9/22/2022	JAR	Review docket sheet and filings, including ECF Nos. 1, 12, 17, 24, 26, 27, 28, 31, 34, 35, 37, 44, 46 (8:53 am – 9:11 am, 9:35 am – 10:14 am), Call with Jim re: potential objection to settlement agreement (10:16 am – 10:35 am, 12:49 pm – 1:09 pm), Call with Jim and Jeff re: potential objection to settlement agreement (11:04 am – 12:10 pm)	2.70	
9/22/2022	GBT	Telephone conference with Jesse Roche on potential objection (10:16 am – 10:35 am, 12:49 pm – 1:09 pm); Review case filings (10:35 am – 11:03 am); Telephone conference with counsel – Jesse Roche and Jeffrey A. Belkin on potential objection to settlement agreement (11:04 am – 12:10 pm); Review case pleading ECF #33 (1:52 p.m.-2:18 p.m.); telephone conference with Jeffrey A. Belkin (2:27 p.m.-3:40 p.m.) and prepare and finalize engagement letter to Jane Belkin via email along with forwarding the 9/12/2022 Richmond Times Dispatch article “More Rate Increases on Tap for Long-term Care Plans” (3:41 p.m.-4:00 p.m.).	4.20	
9/23/2022	GBT	Receipt of signed engagement letter via priority mail from Jane Belkin	.10	
9/28/2022	JAR	Drafting objection to settlement agreement (2:37 pm – 3:56 pm), call with Jim re: draft objection (4:34 pm – 4:53 pm)	1.63	
9/28/2022	GBT	Telephone conference with counsel – Jesse Roche on objection (4:34 pm – 4:53 pm)	.32	
9/29/2022	JAR	Drafting objection to settlement agreement (8:20 am – 8:39 am); Call with Jim and later Jeff re: draft objection (4:23 pm – 4:56 pm)	.87	
9/29/2022	GBT	Preparation of Application for Jeffrey A. Belkin to appear in Haney, et al. v. Genworth Life Ins. Co., et al. via Pro Hac Vice and forward same to Belkin for signature and instructions. (1:41p.m.- 1:53 p.m.).	.20	
9/29/2022	GBT	Telephone conference with counsel – Jesse Roche and, later, Jeffrey A. Belkin on content of objection letter/pleading and case strategy (4:23 pm – 4:56 p.m.).	.55	



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9/30/2022	GBT	Travel to USDC and file notice of objection and objection to settlement agreement (later filed as ECF #53) with copy to Settlement Administrator for Jane Belkin and Application to Qualify as a Foreign Attorney for Jeffrey A. Belkin to serve as Pro Hac Vice; travel from Court to USPO for mailing to Settlement Administrator and return to office (11:39 a.m.-12:44 p.m.).	1.1	
	GBT	SEPTEMBER 2022	9.42	9.42
	JAR	SEPTEMBER 2022	6.25	6.25
	KM	SEPTEMBER 2022	1.00	1.00
10/7/2022	GBT	Telephone conference with Jeffrey A. Belkin and Jesse, emails to Plaintiff counsel Jonathan Petty (1:14 p.m.) and current counsel for objectors (1:29 p.m.) regarding resolution of the matter prior to 11/17/2022 hearing (11:05 a.m.-11:24 a.m.; 12:50p.m. - 1:30 p.m.)	1.0	
10/7/2022	JAR	Call with Jim and Jeff re: proposed relief to policy holders (11:05 am – 11:24 pm)	.32	
10/21/2022	GBT	Review of Jeffrey A. Belkin's case memo of 10/19/2022 (1:30 p.m.- 1:54 p.m.))	.35	
10/28/2022	GBT	Conference call with Genworth counsel Michael Duvall, Belkin and Jesse (1:05 p.m.- 1:20 p.m.-GBT ended early as in Dalzell depositions in Fairfax)	.25	
10/28/2022	JAR	Research re: Skochin (10:48 am – 11:05 am); Call with Jeff re: proposed relief to policy holders (12:38 pm – 12:58 pm); Call with Jeff and Michael Duvall re: proposed relief to policy holders (1:08 pm – 1:44 pm)	1.22	
10/31/2022	GBT	T.C. with Jesse (10:12 a.m.-10:28 a.m.); Received and review of email from Haley Grissom from the law firm of Dentons/Duvall with Protective Order to be signed and returned and email to Belkin and Jesse re same (11:01-11:23).	.55	



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10/31/2022	GBT	Review client documents, i.e., Long Term Care Insurance Policy for Jane Belkin; Premium Increase and Notice of Pendency of Class Action and Proposed Settlement for policy holders of Genworth Life. (2:07p.m.-2:43 p.m.)	.60	
10/31/2022	JAR	Call with Jim re: proposed relief (10:11 am – 10:27 am); E-mail to Jim and Jeff re: summary of Duvall call (12:02 pm – 12:21 pm); Call with Jeff re: Jeff's call with Duvall (4:09 pm – 4:14 pm)	.67	
	GBT	OCTOBER 2022	2.75	12.17
	JAR	OCTOBER 2022	2.21	8.46
	KM	OCTOBER 2022	0.00	1.00
11/1/2022	GBT	Telephone conference with Jeffrey A. Belkin and Jesse Roche regarding plan documents, claims filed and possible settlement on behalf of Jane Belkin; review of long-term care insurance surveys provided by Genworth per PO; Telephone conference with Michael J. Duvall with Jeffrey A. Belkin and Jesse Roche regarding resolution to objector, Jane Belkin's claim and email memorializing the same from Duvall (10:04 a.m.-10:27 a.m., 10:30 a.m. – 10:47 a.m.); (3:42 p.m.-4:10 p.m.) (5:00 p.m.-5:04 p.m.); (7:10 pm.- 7:22 p.m.).	1.40	
11/1/2022	JAR	Reviewing Butler declaration (8:29 am – 8:35 am); Call with Jim and Jeff re: Duvall relief proposal (10:04 am – 10:27 am); Call with Jim re: Duvall relief proposal (10:30 am – 10:47 am)	.77	
11/2/2022	GBT	Telephone conference with Jeffrey A. Belkin re: conversation with objector/policy holder (3:30 p.m. – 3:37 p.m.).	.10	
11/4/2022	GBT	Telephone conference with Jeffery Belkin (4:27 p.m.-4:34 p.m.)	.10	
11/9/2022	GBT	Telephone conference with Jeffrey A. Belkin (1:49 p.m.-1:58 p.m.).	.15	



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11/10/2022	GBT	Review <i>Richmond Times Dispatch</i> article on "Genworth cancels its plans to build new headquarters"; scan and email to Belkin (10:22 a.m.-10:26 a. m).	.10	
11/14/2022	GBT	Review of file and telephone conference with Jesse (10:02 a.m.-10:25 a.m.); Jeffrey A. Belkin regarding attorney fees (11:00 a.m.-11:12 a.m.).	.60	
11/14/2022	JAR	E-mail to Jim and Jeff re: other objectors (1:02 pm – 1:08 pm)	.10	
11/15/2022	GBT	T.C from Belkin- unable to take call from Duvall at 10 am; Email to Michael Duvall advising the same regarding attorney fees and settlement on behalf of Jane Belkin (9:36 a.m. – 9:54 a.m.); Telephone conference with Michael Duvall (10:02 a.m. – 10:07 a.m.); telephone conference with Jesse Roche (10:58 a.m.-11:08 a.m.); review of file and telephone conference with Jeffrey A. Belkin (1:47 p.m. – 2:56 p.m.); telephone conference with Jesse (3:10 pm.- 3:36 p.m.); T.C./LDVM and f/u email to Genworth counsel Drew Marrocco (3:38 p.m-3:48 p.m.).	2.30	
11/15/2022	JAR	Research re: objector attorneys' fees (10:26 am – 10:57 am, 2:57 pm – 3:09 pm); Call with Jim re: Duvall settlement offer (10:58 am – 11:08 am, 3:10 pm – 3:36 pm); Call with Jim and Jeff re: Duvall settlement offer (2:31 pm – 2:56 pm);	1.73	
11/16/2022	GBT	Email to Jeffrey A. Belkin re hearing (12:27 p.m.-12:42 p.m.); Phone conference with Court/Judge Payne and email regarding same to Jeffrey A. Belkin and Jesse Roche (3:05 p.m. – 3:57 p.m.); Telephone call to objector J. Bos and left voice mail message (6:05 p.m.) and multiple text exchanges throughout evening (.20); Telephone calls to objectors L. Feinstein and Gray Davis (6:19 p.m.); telephone conference with Gray Davis (7:30 p.m.-7:41 p.m.) Received and review of Ben Vernie's email re: fee and call (7:42 p.m.-7:55 p.m.).	1.65	



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11/17/2022	GBT	Travel to and from and attend hearing in Haney, et al. v. Genworth, et al. in USDC – Richmond Division including meeting with Duvall, Marrocco and Gray Davis. Left court at 11:35 a.m. recess (9:15 a.m.-12:02 p.m.); email to co-counsel summary of 11/17/22 hearing (12:31p.m-12:41p.m.)	2.80	
11/21/2022	GBT	Telephone conference with Duvall (4:27 p.m.- 4:33 p.m.);	.10	
11/22/2022	GBT	Telephone conference with Jeffrey A. Belkin, co-counsel regarding case status and fees and discussion of 11/1/2022 email (4:22 p.m.-4:33 p.m.)	.10	
11/22/2022	JAR	Call with Jeff re: petition and affidavit (10:55 am – 11:11 am)	.27	
11/23/2022	GBT	Prepare time records while reviewing all pleadings and case documents (5:35 a.m.-6:43 a.m.).	1.10	
11/23/2022	JAR	Drafting petition for attorneys' fees (9:22 am – 10:08 am, 10:25 am – 11:16 am, 11:25 am – 11:47 am, 11:54 am – 12:42 pm)	2.78	
11/23/2022	KM	Draft typing of J. Thorsen's time records (9: 15 a.m.-11:20 a.m.)	2.0	
11/25/2022	GBT	Second review of JBT typed time records (9:52 a.m.-11:44 a.m.).	1.80	
11/25/2022	JAR	Drafting petition for attorneys' fees (9:38 am – 10:06 am)	.80	
11/26/2022	JAR	Drafting petition for attorneys' fees (11:56 am – 3:05 pm)	3.15	
11/27/2022	GBT	Review draft petition (4:22 p.m.-4:28 p.m. (.1); 4:45 p.m.-5:54 p.m. (1.15))	1.25	
11/27/2022	JAR	Drafting petition for attorneys' fees (10:45 am – 11:00 am, 11:29 am – 12:47 pm)	1.55	
11/28/2022	JAR	Review Joint Stipulation and Memo (2:49 pm – 2:57 pm); Call with Jim re: petition (4:20 pm – 4:30 pm); Drafting petition for attorneys' fees (5:05 pm – 5:50 pm)	1.05	



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11/28/2022	GBT	Draft Affidavit for JBT (9:50 a.m.-10:00 a.m. (.15)); Telephone conference with Craig Curwood, Esquire re: Affidavit (10:01 a.m.-10:17 a.m. (.20)); Telephone conference with J. Belkin at 10:43 a.m. (.15); Telephone conference with J. Roche at 4:20 p.m.; Received and review of emails and attachments from Duvall/Genworth; Telephone conference with Tim Shulte, Esq. re: Affidavit	1.70	
11/29/2022	JAR	Drafting declarations (9:31 am – 10:07 am, 10:17 am – 10:31 am, 5:41 pm – 6:11 pm); Drafting petition for attorneys' fees (10:31 am – 10:59 am); Call with Jim re: declarations (3:48 pm – 4:00 pm)	1.05	
11/29/2022	GBT	Received and review from M. Duvall re: Objector BOS; JBT text to/from BOS; JBT email to M. Duvall re: BOS JBT response to email from J. Belkin re: BOS, call with JAR (3:48 pm – 4:00 pm, 5:45 p.m.; 8:00 p.m.-8:20 p.m.)	.53	
11/29/2022	KM	Draft typing of J. Belkin's time records (2:10 p.m.-3:08 p.m.)	1.0	
11/30/2022	GBT	Review of 11/29/2022 6:48 p.m. update email from Defendants; Telephone conference calls with J. Roche; email to M. Duvall re: Paragraph 35(d) of Joint Stipulation, update JBT time records, email to T. Shulte, Esq. with JBT fee petition update. Emails to and from defendant counsel Haley Grisson and Michael Duvall, telephone conference with Jesse, emails to Jesse and Jeff and final review of Objector's petition and affidavits, etc. for filing deadlines with the Court (11:48 a.m.-3:05 p.m.; 3:35 p.m.-5:30 p.m.)	5.15	



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11/30/2022	JAR	Calls with Jim re: finalizing petition (12:04 pm – 12:09 pm, 3:14 pm – 3:19 pm, 4:06 pm – 4:15 pm); finalizing petition and time records (12:13 pm – 12:44 pm, 2:05 pm – 2:17 pm, 2:47 pm – 3:01 pm, 3:05 pm – 3:12 pm, 3:42 pm – 3:47 pm, 4:16 pm – 4:26 pm, 4:31 pm – 5:58 pm, 7:05 pm – 7:27 pm); calls with Jeff re: settlement documents (3:20 pm – 3:25 pm, 3:31 pm – 3:41 pm, 3:47 pm – 3:54 pm); preparing petition for filing (7:55 pm – 8:07 pm, 10:16 pm – 10:34 pm)	4.38		
11/30/2022	KM	Updating J. Thorsen's time records (3:19 p.m.-3:48 p.m.)	.50		
	GBT	NOVEMBER 2022	20.93	33.10	
	JAR	NOVEMBER 2022	17.30	25.76	
	KM	NOVEMBER 2022	3.50	4.50	

Fees: Legal Billable Time: **\$31,215.00**

GBT	33.10 hours @ \$600.00 per hour	\$19,860.00
JAR	26.70 hours @ \$400.00 per hour	\$10,680.00
KM	4.5 hours @ \$150.00 per hour	\$675.00



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November 29, 2022

RE: *Haney, et al. v. Genworth Life Insurance Co., et al.*
USDC Civil Action Case No.: 3:22-cv-00055-REP

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Time</u>	<u>Total Time</u>
8/24/2022	JAB	Review of Notice of Proposed Settlement (1.0); telephone call to L. Zipkin, Esquire (class-action atty.) re: potential objection, possible representation (.5)	1.50	
8/30/2022	JAB	Meeting with L. Zipkin and K. Gross, Esquire re: potential representation of Jane Belkin for objection to Proposed Settlement, legal issues, basis for objection, need to engage local counsel.	2.0	
8/31/2022	JAB	Telephone conference with V. Prest, Esquire (contract attorney for class counsel); extensive discussion of terms of Proposed Settlement (good for Genworth, not so good for class members) (1.0); Telephone to court clerk – will need local counsel (.25).	1.25	
		AUGUST 2022 TOTAL TIME:	4.75	4.75
9/7/2022	JAB	Conference with Lipkin and Gross re: basis for objection, strategy, local counsel in Richmond	1.5	
9/9/2022	JAB	Telephone conference re: class action objection, attorney in Richmond – recommendation Harris Butler; email to Butler	.75	
9/16/2022	JAB	Email from Butler – he has a conflict recommended ThorsenAllen; telephone J. Thorsen re: Jane Belkin representation; further telephone conference with Thorsen and J. Roche, Esquire	1.0	



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9/19/2022	JAB	Review documents (received from Thorsen): ECF Docs: 1, 12, 17, 24, 26, 27, 28, 31, 34, 35, 37, 44, 45, and full docket sheet (2.5); telephone conference with Thorsen (.5).	3.0	
9/22/2022	JAB	Telephone conference with J. Thorsen and J. Roche re: grounds for objection to Proposed Settlement (1.25); follow-up telephone conference with Thorsen re: retainer agreement, legal fees (.75).	2.0	
9/22/2022	JAB`	Review of ECF Docs: 33, 33-1 and 33-2.	.50	
9/23/2022	JAB	Telephone conference re: retainer agreement; conference with Jane Belkin re: representation, retainer agreement, transmit signed retainer agreement and retainer; further telephone conference with Thorsen	1.75	
9/29/2022	JAB	Review draft objections, extensive emails to J. Thorsen; draft pro hac vice; telephone conference with Thorsen and Roche re: objections, strategy for economic remedy, burden of proof; fill out pro hac vice application	3.75	
9/30/2022	JAB	Review ECF Docs: 43, 45, 46, 47, 48, 50, 51, 54, 55, 56, 57.	1.50	
		SEPTEMBER 2022 TOTAL TIME:	16.0	20.75
10/3/2022	JAB	Email Thorsen re: possible group of objection attorneys, etc. (.5); Review of ECF Docs: 58, 59, 60, 61 (.5)	1.0	
10/4/2022	JAB	Review amended objection – ECF Doc 58 (.25); review ECF Docs 62, 63, and 64 (.50)	.75	
10/7/2022	JAB	Review ECF Doc. 67 (.25); and review of Thorsen emails (.25)	.50	
10/8/2022	JAB	Telephone conference with Thorsen re: reaching out to other attorneys for objectors, status.	.50	



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10/19/2022	JAB	Draft memo to Thorsen and Roche re: suggestions for our legal position, economic benefit for policy holders, legal fees, and objector fees (1.75); review ECF Docs: 72, 73 (.25)	2.0	
10/20/2022	JAB	Additional memo to Thorsen	1.25	
10/24/2022	JAB	Review of ECF Docs: 74, 75	.50	
10/26/2022	JAB	Telephone conference with M. Duvall (Genworth Atty.) re: our objection	.5	
10/27/2022	JAB	Memo to J. Thorsen and J. Roche re: Duvall telephone conference; Thorsen emails, telephone conference with Thorsen and Roche re: Duvall conference call and our position, etc.	1.0	
10/28/2022	JAB	Review case; telephone conference with J. Roche re: our position, telephone conference with Thorsen, Roche, Duvall re: possible resolution (1.5); follow-up telephone conference with Duvall re: another possible resolution (.5)	2.0	
10/31/2022	JAB	Review and sign Protective Order	.25	
OCTOBER 2022 TOTAL TIME:				10.25 31.00
11/1/2022	GBT	Review Butler declarations in support of legal fees in another matter (.5); Telephone conference with Roche and Thorsen re: Protective Order (.5); conference call with Duvall, Thorsen and Roche re: settlement of Jane Belkin, objector (.5); review Duvall settlement proposal (.5)	2.0	
11/2/2022	JAB	Telephone conference with Walter Leen re: his objection, history of Genworth Litigation, review his findings (.75); Telephone conference with Duvall re: Genworth settlement proposal (.75)	1.50	
11/3/2022	JAB	Review additional W. Leen material (.5); Review ECF Doc 79 – reply to response to motion for approval of settlement (.25); Review of Doc. 81 and 82 (.25)	1.0	



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11/4/2022	JAB	Review of W. Leen documents (.5); Telephone conference with Thorsen re: argument to withdraw objection (.75)	1.25	
11/9/2022	JAB	Conference call with M. Duvall, J. Thorsen re: computation of legal fees (.5); Telephone conference with J. Thorsen re: conference call and further negotiations with Duvall (.5)	1.0	
11/10/2022	JAB	Review Doc. 86 (.25); telephone conference with J. Thorsen (.25)	.50	
11/11/2022	JAB	Telephone conference with M. Duvall re: computation of legal fees (.5); telephone conference with J. Thorsen re: Duvall conference (.25)	.75	
11/13/2022	JAB	Telephone conference with M. Duvall re: computation of legal fees (.5); telephone conference with J. Thorsen re: legal fees (.25)	.75	
11/14/2022	JAB	Telephone conference of J. Thorsen re: Duvall (.5); telephone conference with Duvall re: legal fee dispute (.5); telephone conference with Thorsen re: Duvall conference (.25)	1.25	
11/15/2022	JAB	Telephone conference with J. Thorsen re: legal fees, his conference with Duvall	.5	
11/16/2022	JAB	Telephone conference and J. Roche re: settlement talks, fee resolution	.75	
NOVEMBER 2022 TOTAL TIME:			11.25	42.25

Fees: Attorney Billable Time: **\$21,125.00**
JAB 42.25 hours @ \$500.00 per hour